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September 2, 2014

**Via E-mail**Sheila McAnaney  
US EPA Region 5  
Mail Code: C-14J  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3507Re: U.S. EPA Request for Information Pursuant to Section 104(e) of CERCLA  
and Sections 308 and 311 of CWA

Dear Ms. McAnaney:

I am writing regarding the above-referenced information request that was issued by the United States Environmental Protection Agency ("EPA"), Region 5 to Statoil USA Onshore Properties, Inc. ("Statoil"). The information request was received on August 26, 2014. The due date described in the information request is 14 calendar days from Statoil's receipt of the letter, making the response due on September 9, 2014. On Statoil's behalf, I request a 45-day extension, making the response to the information request due no later than October 24, 2014. There are several bases to support this request for an extension, as further discussed below.

The Region has requested both narrative responses and the production of documents in a total of 65 questions posed to Statoil. Additionally, 14 of the questions include multiple subparts. It is an immense request, and will take the company a substantial amount of time and resources in order to assemble its response. A deadline of 14 calendar days is unreasonable in light of the nature of the requested information, and especially due to the competing deadlines of the settlement agreement that Statoil entered into with EPA on August 20, 2014, related to the Eisenbarth well pad. EPA's authority to request information is imbued with a reasonableness element, *see e.g.*, 42 U.S.C. § 9604(e), which appears to be in tension with the 14-day deadline EPA provided Statoil to respond to the information request.

Based on our prior discussions, I understand that it has taken the Region several weeks (since at least July 11, 2014) to prepare and transmit this information request to Statoil, which is indicative of the magnitude of information being requested. Since its receipt of the information request, Statoil has been actively engaged in identifying the appropriate business units, and

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relatedly, the appropriate individuals within those business units, who may have relevant, responsive information. The Region's information request not only cuts across many different environmental program areas, but it also transects several different business units at the company.

Moreover, the requested information is not maintained by Statoil in the ordinary course of business in the manner requested by the Region. Thus, upon identifying the appropriate individuals in the relevant business units who may have responsive information, Statoil must compile the information that Region 5 has requested. It simply will take several weeks in order for the company to comply with the Region's information request, which requires it to identify the relevant individuals, compile the relevant information, prepare narrative responses to the 65 (potentially 79) questions posed, and assemble the relevant documents for production.

Statoil respectfully submits that this 45-day extension facilitates Region 5's interest in receiving the requested information in a timely manner, while ensuring that Statoil has sufficient time to compile and submit relevant information to the Region. While Statoil will make every effort to meet this schedule, it reserves the right to request additional time, should any unexpected circumstances arise that affects its ability to timely respond. Further, Statoil reserves the right to supplement its response, should it subsequently identify relevant information that was not previously provided to the Region.

Thank you for your consideration of Statoil's request for an extension to respond to the information request. Please contact me if you have any questions.

Sincerely,



Ilana Saltzbart

cc: Thomas Gottsegen, Statoil